


# FairLaw Firm



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**Services**

To:  
Juan Mendez  


INVOICE

Open (Not Sent)

Invoice # 630  
Invoice Date: 8/2/2024  
Due Date: 9/1/2024

Amount due 26,804.60
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Case 1:24-cv-05018-KMW Document 37-3 Entered on FLSD Docket 08/02/2024 Page 2 of 14					
Date	Staff Member	Category	Description	Duration	Total
2/7/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Initial intake with Mr. Mendez; discuss his claim and what to expect; also, review sign-up procedure	1.00	500.00
2/8/2024	Brian H. Pollock Esq.	Draft/revise	Draft letter to client regarding the privileged nature of our communications and the requirement that he preserve all evidence related to this case	0.50	250.00
2/8/2024	Steffany Sanguino	Paralegal	Draft email requesting documents from the client; I then called him to discuss the materials requested and he advised he saw the email and was collecting documents to provide us with.	0.30	49.50
2/8/2024	Steffany Sanguino	Paralegal	Receipt and conduct initial review of documents provided by client; organize same	0.50	82.50
2/9/2024	Steffany Sanguino	Paralegal	Coordinate with client regarding the documents he was trying to provide us with.	0.20	33.00
2/12/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Complaint and Summonses; also, conduct research online re: Defendants' website and addresses for inclusion in the Summons	1.20	600.00
2/12/2024	Steffany Sanguino	Paralegal	Receipt of emails from Mr. Mendez enclosing time cards dating back to 2019; review and organize them for our files and for use in the case	1.20	198.00
2/12/2024	Steffany Sanguino	Paralegal	I emailed the client to find out about whether he has more documents to provide.	0.10	16.50
2/12/2024	Steffany Sanguino	Paralegal	Draft the Civil Coversheet for filing	0.20	33.00
2/12/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Clerk's Notice of Judicial Assignment (Judge Williams and Magistrate Judge Goodman)	0.20	100.00
2/12/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Order of Referral and Notice of Court Practice in FLSA Case	0.60	300.00
2/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice of Judicial Assignment (Judge Williams and Magistrate Judge Goodman)	0.20	65.00
2/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Summonses issued to to Alpha & Omega and Liz Lago.	0.20	65.00
2/13/2024	Steffany Sanguino	Paralegal	I called the client to f.u with more documents. The client informed me that he had a few more text messages. I also requested he provide us with his estimate or the hours he's owed.	0.20	33.00
2/13/2024	Steffany Sanguino	Paralegal	Review file and prepare first draft of the Statement of Claim.	0.40	66.00
2/13/2024	Brooks LaRou Esq.	Draft/revise	Draft Notice of Appearance for this case	0.20	65.00
2/13/2024	Brooks LaRou Esq.	Draft/revise	Drafted letter Mr. Mendez introducing myself as the attorney who will be handling the day-to-day events on his case and to reach out to me if he has any questions or concerns	0.30	97.50
2/15/2024	Steffany Sanguino	Paralegal	Receipt of multiple pictures from Mr. Mendez; review and organize same for use in the case	0.30	49.50
2/16/2024	Brooks LaRou Esq.	Draft/revise	Draft letter to client re: case filed, what to expect, and when we should receive a response to the lawsuit	0.30	97.50
	Steffany		I called the client and discussed his estimated calculations of the		

2/16/2024	Steffany Sanguino	Paralegal	hours he's owed. The client said he would look into it this weekend and provide it to us.	0.20	33.00
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2/16/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Review of time and pay records, and additional supporting documents provided by client.	0.50	162.50
2/19/2024	Steffany Sanguino	Paralegal	I called the client to f.u with his calculations of owed hours. no.a.I left a detailed v.m, and sent a text.	0.15	24.75
2/19/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Compiled data from client's timesheets (2/13/21-2/2/24) into excel spreadsheet to calculate initial estimate of unpaid overtime wages.	1.00	325.00
2/21/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding calculation of unpaid wages.	0.30	97.50
2/22/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Revisions to estimate of unpaid wages based on additional information provided by client regarding deduction of lunch hours.	0.70	227.50
2/22/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Revisions to Statement of Claim.	0.50	162.50
2/22/2024	Brooks LaRou Esq.	Email with Client	Email to client regarding draft statement of claim and estimation of damages.	0.10	32.50
2/22/2024	Steffany Sanguino	Paralegal	I called the client to f.u with his approval of the statement of claim.No.a; I couldn't leave a v.m, so I texted the client.	0.14	23.10
2/22/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of client's estimation of damages.	0.30	97.50
2/22/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding client's estimation of damages and revisions to Statement of Claim.	0.20	65.00
2/22/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Final revisions to Statement of Claim.	0.10	32.50
2/22/2024	Brooks LaRou Esq.	Draft/revise	Drafted Notice of Change of Address and Contact Information.	0.20	65.00
2/23/2024	Steffany Sanguino	Paralegal	OT calculations have been drafted.	5.46	900.90
2/26/2024	Steffany Sanguino	Paralegal	I emailed the client to confirm if he has more documents to provide us with.	0.10	16.50
2/27/2024	Steffany Sanguino	Paralegal	We have been informed by the process server that they could not serve the defendants. I did an online search on the property and Sunbiz, and it appears we have the correct address	0.15	24.75
2/27/2024	Steffany Sanguino	Paralegal	Documents from the client have been received, reviewed, and downloaded.	0.10	16.50
2/28/2024	Steffany Sanguino	Paralegal	I called the client to request where the office location was, as we could not serve the defendants with the address from Sunbiz and the public property records. The client didn't answer, so I sent an email.	0.20	33.00
2/29/2024	Steffany Sanguino	Paralegal	I emailed the client about the address to serve the defendant's	0.10	16.50
3/1/2024	Steffany Sanguino	Paralegal	I emailed the client to f.u with an address to serve the defendants	0.10	16.50
3/4/2024	Steffany Sanguino	Paralegal	I emailed the client to confirm if he has more documents to provide us with	0.10	16.50



3/5/2024	Steffany Sanguino	Paralegal	Email exchange with the client. He confirmed he doesn't have more documents to provide us with.	0.10	16.50
3/6/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Magistrate Judge Goodman's Order on Discovery Procedures.	0.30	97.50
3/12/2024	Steffany Sanguino	Paralegal	Provided the client with an update on the status of the case, including what to expect	0.80	132.00
3/13/2024	Steffany Sanguino	Paralegal	I provided the client with an update about the service.	0.10	16.50
3/13/2024	Steffany Sanguino	Paralegal	I spoke with the client; he explained to me which door the process server needs to use when he goes to the location. The client is going to take a picture and send it to us.	0.10	16.50
3/14/2024	Steffany Sanguino	Paralegal	The process server has not been able to serve the defendants, so he asked for us to provide a picture of Liz. I called the client and requested a photo. The client said he would email me a photo of Liz, the newly hired, and her sister-in-law.	0.10	16.50
3/25/2024	Steffany Sanguino	Paralegal	Service for Liz Lago	0.28	46.20
3/25/2024	Steffany Sanguino	Paralegal	Service for Alpha and Omega	0.28	46.20
3/25/2024	Steffany Sanguino	Paralegal	Draft NOF for the Affidavit of Service on Defendant Lugo	0.20	33.00
3/25/2024	Steffany Sanguino	Paralegal	Draft NOF for the Affidavit of Service on Alpha and Omega	0.20	33.00
3/25/2024	Steffany Sanguino	Paralegal	I provided an update to the client. I informed him the defendants were served.	0.10	16.50
3/25/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Returns of Service for Defendants Alpha & Omega and Liz Lago.	0.20	65.00
3/26/2024	Steffany Sanguino	Paralegal	The first draft of Rule 26 has been drafted.	0.60	99.00
3/27/2024	Steffany Sanguino	Paralegal	I emailed the client to request what information his witness had.	0.10	16.50
3/27/2024	Brooks LaRou Esq.	Email Communication	Receipt and review of email from client regarding case status.	0.20	65.00
4/4/2024	Steffany Sanguino	Paralegal	I emailed the client to f.u with the information his witnesses have.	0.12	19.80
4/4/2024	Steffany Sanguino	Paralegal	Email exchange with the client regarding his witnesses.	0.13	21.45
4/9/2024	Steffany Sanguino	Paralegal	Email exchange with the client about his witness.	0.10	16.50
4/9/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Calculated and calendared date for Defendants' responses to Complaint.	0.10	32.50
4/10/2024	Steffany Sanguino	Paralegal	I emailed the clients witness to obtain information about the client's case and the company.	0.10	16.50
4/11/2024	Brooks LaRou Esq.	Email Communication	Receipt and review of email from Plaintiff's witness (Amelia Mondejar) regarding her knowledge of Plaintiff's claims.	0.20	65.00
4/12/2024	Steffany Sanguino	Paralegal	I received detailed information from the witness.	0.20	33.00

4/12/2024	Steffany Sanguino	Paralegal	The SOC has been emailed to OC with documents. The documents were combined and bate stamped, and an expiration and password were created.	0.22	41.25
4/12/2024	Brooks LaRou Esq.	Draft/revise	Drafted Motion for Clerk's Entry of Default against Alpha & Omega and Liz Lago.	0.40	130.00
4/12/2024	Brooks LaRou Esq.	Draft/revise	Drafted proposed Clerk's Default against Alpha & Omega and Liz Lago.	0.20	65.00
4/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Answer and Affirmative Defenses.	0.50	162.50
4/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Juan Aragon regarding scheduling Settlement Conference.	0.10	32.50
4/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Compiled documents for production with service of Plaintiff's Statement of Claim.	0.50	162.50
4/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Steffany Sanguino regarding service of Statement of Claim, Notice of Court Practice [ECF 4], and Plaintiff's supporting documents.	0.10	32.50
4/15/2024	Steffany Sanguino	Paralegal	The SOC has been emailed to OC with documents. The documents were combined and bate stamped, and an expiration and password were created.	0.60	99.00
4/15/2024	Steffany Sanguino	Paralegal	P's Certificate of Interest Parties has been drafted	0.27	44.55
4/15/2024	Brooks LaRou Esq.	Draft/revise	Drafted Notice of Compliance with Court's Order of Referral and Notice of Court Practice in FLSA Cases.	0.20	65.00
4/15/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Plaintiff's Certificate of Interested Parties.	0.30	97.50
4/15/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Steffany Sanguino regarding filing Plaintiff's Certificate of Interested Parties.	0.10	32.50
4/18/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research and then draft conferral email to Ms. Diaz regarding Defendants' Answer and Affirmative Defenses and cite caselaw in same	1.30	650.00
4/18/2024	Brian H. Pollock Esq.	Email Communication	Review file and then draft email to Ms. Diaz enclosing additional time records and request that her clients provide unaltered time records and explain their impact on settlement negotiations and enclose examples of time before her clients altered it	0.50	250.00
4/19/2024	Steffany Sanguino	Paralegal	Additional documents supporting the SOC have been bate-stamped and issued to OC.	0.19	31.35
4/22/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants responding to Plaintiff's conferral regarding Defendants' affirmative defenses.	0.20	65.00
4/24/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research and then draft our M/Strike Affirmative Defenses	3.20	1,600.00
4/24/2024	Steffany Sanguino	Paralegal	I provided the client with an update.	0.10	16.50
4/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Plaintiff's Motion to Strike.	0.20	65.00



4/25/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Certificate of Interested Parties and Corporate Disclosure Statement. Deposition 5/31/24.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Juan Mendez regarding preparing initial drafts of Joint Scheduling Report and Proposed Scheduling Order.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice to Filer re: Defendants' Certificate of Interested Parties/Corporate Disclosure Statement.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Renewed Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
4/29/2024	Brooks LaRou Esq.	Draft/revise	Drafted Joint Scheduling Report and Proposed Scheduling Order.	0.80	260.00
4/30/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice to Filer re: ECF 17.	0.10	32.50
4/30/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's Third Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
4/30/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Analyze the documents produced by Defs with the Statement of Claim against the documents in our file; then, draft email to defense counsel re: missing documents	0.90	450.00
5/1/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review and revisions to drafts of Joint Scheduling Report and Proposed Scheduling Order sent by counsel for Defendants (Ena Diaz).	0.30	97.50
5/1/2024	Brooks LaRou Esq.	Email Communication	Emails with counsel for Defendants (Ena Diaz) regarding revisions to her drafts of the parties' Joint Scheduling Report and Proposed Scheduling Order.	0.20	65.00
5/1/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant Cataldo's Notice of Filing document in support of her Motion for Order establishing witness/exhibit list deadlines for Injunction Hearing.	0.10	32.50
5/1/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding documents produced by Defendants in connection with their Response to Plaintiff's Statement of Claim.	0.10	32.50
5/1/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Response to Plaintiff's Statement of Claim.	0.20	65.00
5/1/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Conferral with Juan Aragon regarding scheduling date for Settlement Conference.	0.10	32.50
5/1/2024	Brooks LaRou Esq.	Email Communication	Email with counsel for Defendants (Ena Diaz) regarding selection of trial dates.	0.10	32.50
5/1/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding scheduling date for Settlement Conference.	0.10	32.50
5/2/2024	Steffany Sanguino	Paralegal	I called the client to confirm his availability.	0.10	16.50
5/2/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Joint Scheduling Report and Proposed Scheduling Order.	0.10	32.50

5/3/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Scheduling Order filed by counsel for Defendants (Ena Diaz). Receipt and review of Court's Scheduling Order.	0.10	32.50
5/3/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Scheduling Order.	0.20	65.00
5/4/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order [ECF No. 23] requiring parties to jointly file Notice of Availability for Settlement Conference.	0.10	32.50
5/6/2024	Steffany Sanguino	Paralegal	I called the chambers to confirm if May 30th works for the Mag Judge and I was advised they're going to call us back.	0.20	33.00
5/6/2024	Steffany Sanguino	Paralegal	We received the Scheduling Order signed by the Judge. Deadlines were added to the file.	0.10	16.50
5/6/2024	Steffany Sanguino	Paralegal	Email exchange with Oc regarding the Settlement Conference.	0.20	33.00
5/6/2024	Brooks LaRou Esq.	Draft/revise	drafted Notice of Availability for Settlement Conference	0.30	97.50
5/6/2024	Brooks LaRou Esq.	Draft/revise	Draft Letter to Client About Trial Setting	0.30	97.50
5/7/2024	Brooks LaRou Esq.	Email Communication	Receipt of emails from counsel for Defendants (Ena Diaz) regarding selection of dates for settlement conference.	0.10	32.50
5/7/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Joint Notice of Availability for Settlement Conference.	0.20	65.00
5/7/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) regarding draft Joint Notice of Availability for Settlement Conference for approval.	0.10	32.50
5/8/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel from Defendants (Ena Diaz) regarding her revisions to draft of Joint Notice of Availability for Settlement Conference.	0.10	32.50
5/8/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) approving her revisions to draft of Joint Notice of Availability for Settlement Conference.	0.10	32.50
5/8/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order Scheduling Settlement Conference for 6/17/24.	0.20	65.00
5/8/2024	Brooks LaRou Esq.	Draft/revise	Draft ltr to client re the upcoming in person settlement conference, what to expect, parking, the need to attend, and enclosing an article discussing settlements vs. trials	0.50	162.50
5/8/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's Response to Plaintiff's Motion to Strike.	0.20	65.00
5/9/2024	Steffany Sanguino	Paralegal	File review, reminder to Brooks regarding the revision of the Rule 26.	0.10	16.50
5/9/2024	Steffany Sanguino	Paralegal	We received the Defendant's Response in Opposition to Plaintiff's Motion to Strike Affirmative Defenses.	0.10	16.50
5/14/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research and then draft Reply for our MTS directed to the Affirmative Defenses	1.10	550.00
5/24/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding mediators to be proposed to counsel for Defendants.	0.10	32.50



5/24/2024	Steffany Sanguino	Paralegal	We emailed OC suggesting mediators, and we have agreed to Karen Evans.	0.10	16.50
5/24/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding preferred dates for mediation.	0.10	32.50
5/24/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding preparation and filing of Joint Notice of Mediator Selection.	0.10	32.50
5/24/2024	Steffany Sanguino	Paralegal	Notice of selection of mediator has been drafted and filed.	0.20	33.00
5/24/2024	Steffany Sanguino	Paralegal	I reached out to mediator Evans to request dates of availability. Emailed the dates to OC.	0.20	33.00
5/24/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding mediator selection.	0.10	32.50
5/28/2024	Steffany Sanguino	Paralegal	I called the client to confirm his availability for mediation.	0.20	33.00
5/29/2024	Steffany Sanguino	Paralegal	Reached out to the mediator to request their availability.	0.10	16.50
5/30/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Plaintiff's Rule 26 Initial Disclosures.	0.40	130.00
5/31/2024	Brooks LaRou Esq.	Email Communication	Receipt of emails from counsel for Defendants (Ena Diaz) regarding availability and forum for mediation.	0.10	32.50
6/2/2024	Brooks LaRou Esq.	Draft/revise	Revisions to Joint Notice of Mediator Selection.	0.20	65.00
6/2/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) regarding draft of Joint Notice of Mediator Selection.	0.10	32.50
6/3/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding agreement to date, time, and forum for mediation.	0.10	32.50
6/3/2024	Brooks LaRou Esq.	Draft/revise	Final revisions to draft Joint Notice of Mediator Selection.	0.10	32.50
6/3/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding confirming mediation date/time with mediator, and filing Joint Notice of Mediator Selection.	0.10	32.50
6/3/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review file and then revise the Rule 26 Disclosures by Plaintiff	0.60	300.00
6/3/2024	Brian H. Pollock Esq.	Draft/revise	Draft RFPs to Defendants	0.80	400.00
6/3/2024	Brian H. Pollock Esq.	Draft/revise	Draft INTs to Defendant, Liz Lago	0.60	300.00
6/3/2024	Brian H. Pollock Esq.	Draft/revise	Draft INTs to Defendant, Alpha & Omega	0.80	400.00
6/3/2024	Brooks LaRou	Unassigned	Conferral with Steffany Sanguino regarding service of Plaintiff's Rule 26 Initial Disclosures, First Interrogatories, and First Requests for	0.10	32.50



6/3/2024	Brooks LaRou Esq.	Email Communication	Production. Email to counsel for Defendants (Ena Diaz) regarding 10/23/24 mediation date and approval of Joint Notice of Mediator Selection.	0.10	32.50
6/3/2024	Steffany Sanguino	Paralegal	Receipt of the Defendants' Rule 26 Disclosures	0.20	33.00
6/3/2024	Steffany Sanguino	Paralegal	I served OC with our discovery request.	0.30	49.50
6/3/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review time cards produced by Defendants again and then conduct online research re: OnTheClock program to then draft Second RFPs to Defendant to request the audit and activity logs for the time records produced to show the changes she made to his time records	0.60	300.00
6/3/2024	Brian H. Pollock Esq.	Email with Client	Draft email to Mr. Mendez explaining our strategy for obtaining the audit and activity logs and providing him with the time and pay records produced and asking him to send us any other docs he has to show that she altered time records	0.20	100.00
6/3/2024	Steffany Sanguino	Paralegal	Draft email serving the Second Request for Production on Defendants	0.20	33.00
6/3/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Rule 26 Initial Disclosures.	0.30	97.50
6/4/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of documents produced in connection with Defendants' Rule 26 initial disclosures.	0.10	32.50
6/4/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Comparison of time records provided by client with records provided by Defendants in preparation for 6/4/24 phone call with client.	0.40	130.00
6/4/2024	Steffany Sanguino	Paralegal	File review: I looked for the "Bank statements." The client says he previously sent them but found nothing.	0.10	16.50
6/4/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding time and pay records, status of case, and next steps.	0.20	65.00
6/4/2024	Brian H. Pollock Esq.	Draft/revise	Drafted ltr to client re mediation via zoom	0.30	150.00
6/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of email from Mrs. Evans-Putney, along with the enclosed letter and confidentiality agreement	0.50	250.00
6/7/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Notice of No Related Action	0.20	100.00
6/7/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Certificate of Interested Parties	0.30	150.00
6/7/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft letter to Mr. Mendez enclosing our Rule 26 disclosures to be sent by email	0.30	150.00
6/7/2024	Steffany Sanguino	Paralegal	The client emailed us confirming he has more documents to provide us with, but it's unable to send them, so he will have to drop them off. I provided the client with our hours and address.	0.10	16.50
6/10/2024	Brian H. Pollock Esq.	Email Communication	Draft email to Ms. Diaz following up on my April 18 request for the records identifying alterations to Mr. Mendez's time records and explaining that without those records, he is not likely to be motivated to negotiate much off his demand; also, review file for same	0.30	150.00

6/10/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) coordinating pre-settlement conference in person call.	0.10	32.50
6/10/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of snippy email from Ms. Diaz, as per usual, re: her client's lack of an availbale audit trail and remarks re: Mr. Mendez's claimed dispute as to the accurace of the time records	0.20	100.00
6/10/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of lengthy email from Ms. Diaz in response to mine re: the issue of altered time records, the lack of an "audit trail", and raising the issue that Mr. Mendez was clocking in before he arrived at work (foreshadowing he was stealing time), along with raising other issues	0.30	150.00
6/11/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct legal research re: sufficiency of evidence necessary to dispute accurace of time records and then provide same to Mr. LaRou for use in connection with the upcoming settlement conference and letter to Magistrate Judge Goodman re: same	0.60	300.00
6/11/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendant (Ena Diaz) setting pre-settlement conference call for 6/14/24.	0.10	32.50
6/11/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding documents in his possession rebutting accuracy of Defendant's time records.	0.40	130.00
6/11/2024	Brooks LaRou Esq.	Draft/revise	Drafted Confidential Pre-Settlement Conference Statement to Magistrate Judge Goodman.	1.00	325.00
6/12/2024	Steffany Sanguino	Paralegal	Receive multiple electronic materials from Mr. Mendez; review and then organize them for use in the case. Then, advise Mr. LaRou of the significance of same based on my initial review	0.90	148.50
6/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of documents produced by client 6/12/24; comparison of documents from client with documents produced by Defendant; created Excel spreadsheet reflecting the same.	2.50	812.50
6/12/2024	Brooks LaRou Esq.	Draft/revise	Revisions to draft of Pre-Settlement Conference Statement to Judge Goodman.	0.60	195.00
6/12/2024	Steffany Sanguino	Paralegal	Additional documents to the statement of claim have been combined and bate-stamped, and a Dropbox link was created and emailed to OC.	0.50	82.50
6/12/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding sending additional documents to Defendants' counsel.	0.10	32.50
6/12/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding sending Confidential Pre-Settlement Conference Statement to Judge Goodman.	0.10	32.50
6/13/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) confirming telephone conference for 6/14/24.	0.10	32.50
6/13/2024	Steffany Sanguino	Paralegal	I called client to remind about / confirm upcoming settlement conference and I emailed him the ltr re settlement conf in person	0.20	33.00
6/13/2024	Steffany Sanguino	Paralegal	File review, I issued a reminder that we must submit an itemized computation of the alleged damages to the defendants.	0.10	16.50
6/13/2024	Brooks LaRou Esq.	Unassigned	Revisions to unpaid wage spreadsheet; re-calculation of damages in preparation for Settlement Conference 6/17/23.	1.00	325.00
6/13/2024	Brooks LaRou Esq.	Phone Call	Phone call with client in preparation for Settlement Conference 6/17/24.	0.50	162.50
	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) attaching spreadsheet of		



6/13/2024	Brooks LaRou Esq.	Email Communication	revised calculation of damages in preparation for settlement conference 6/17/24.	0.10	32.50
6/14/2024	Brooks LaRou Esq.	Unassigned	Preparation for pre-settlement conference phone call with counsel for Defendants (Ena Diaz).	0.20	65.00
6/14/2024	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Ena Diaz) regarding opening settlement demand and calculation of damages.	0.10	32.50
6/14/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) conveying Plaintiff's opening settlement offer.	0.20	65.00
6/14/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and initial review of OnTheClock spreadsheet sent by Defendants 6/14/24.	0.50	162.50
6/14/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding OnTheClock spreadsheet sent by Defendants, allegations of clocking in/out while not on the job, and defenses to the same.	0.30	97.50
6/16/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Review file in preparation for the upcoming settlement conference	1.00	325.00
6/17/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Continued review of OnTheClock GPS records produced by Defendants 6/14/24 in preparation for Settlement Conference.	0.50	162.50
6/17/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Continued preparation for and then attend Settlement Conference before Magistrate Judge Goodman.	4.50	1,462.50
6/17/2024	Brooks LaRou Esq.	Unassigned	Conferred with client regarding next steps of case.	0.10	32.50
6/18/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendant (Ena Diaz) regarding whether she opposes our Motion to Amend Complaint.	0.10	32.50
6/19/2024	Brooks LaRou Esq.	Email Communication	Phone call and follow-up email to counsel for Defendants (Ena Diaz) regarding Plaintiff's Motion to Amend Complaint.	0.10	32.50
6/19/2024	Brooks LaRou Esq.	Draft/revise	Phone call with counsel for Defendants (Ena Diaz) regarding settlement discussions and amending complaint.	0.10	32.50
6/19/2024	Brooks LaRou Esq.	Email Communication	Draft email to counsel for Defendants (Ena Diaz) conveying our settlement offer, to include the monetary component and the non-monetary terms for her clients' consideration after conferral with Mr. Pollock re: same	0.30	97.50
6/20/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Order granting in part Plaintiff's Motion to Strike Affirmative Defenses.	0.20	65.00
6/20/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) conveying settlement counteroffer.	0.10	32.50
6/20/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) conveying settlement counteroffer.	0.10	32.50
6/21/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) accepting Plaintiff's settlement offer.	0.10	32.50
	Brian H.		Draft the proposed Motion to Approve, Notice of Settlement, and		

6/21/2024	Pollock Esq.	Draft/revise	proposed Settlement Agreement; then, draft email to defense counsel enclosing and regarding same.	1.50	750.00
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6/24/2024	Brooks LaRou Esq.	Phone Call	Phone call with client to congratulate him on the settlement of his case and advising that he will be receiving more than he authorized us to accept	0.20	65.00
7/1/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) requesting her revised draft of Settlement Agreement and Motion for Settlement Approval.	0.10	32.50
7/3/2024	Brooks LaRou Esq.	Draft/revise	Review and revisions to revised draft of settlement agreement sent by counsel for Defendants 7/2/24.	0.30	97.50
7/3/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants attaching draft settlement agreement with further revisions.	0.10	32.50
7/3/2024	Brooks LaRou Esq.	Email with Client	Received and responded to email from client regarding status of draft settlement agreement.	0.20	65.00
7/8/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of letter by email from Ms. Evans-Putney confirming that mediation has been canceled	0.20	100.00
7/9/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) following up on her revisions to draft of Settlement Agreement and Motion for Approval.	0.10	32.50
7/16/2024	Steffany Sanguino	Paralegal	I emailed the client the W9 and texted him to inform.	0.10	16.50
7/16/2024	Steffany Sanguino	Paralegal	Receipt of W-9 signed by Mr. Mendez	0.10	16.50
7/17/2024	Steffany Sanguino	Paralegal	Review the materials in the file; further organize documents provided by client and the documents exchanged in discovery; also, review deadlines	0.30	49.50
7/18/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding her acceptance of revisions to settlement agreement; review the settlement agreement	0.20	65.00
7/18/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of final draft of settlement agreement sent to Defendants for execution.	0.10	32.50
7/18/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendant (Ena Diaz) regarding sending Settlement Agreement to client for signature.	0.10	32.50
7/18/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino, paralegal, regarding having the client execute the Settlement Agreement	0.10	32.50
7/18/2024	Steffany Sanguino	Paralegal	Coordinate with client to execute settlement agreement and then draft email to him requesting his electronic signature.	0.40	66.00
7/18/2024	Steffany Sanguino	Paralegal	Draft email to defense counsel enclosing the release executed by Mr. Mendez	0.20	33.00
7/18/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding sending Settlement Agreement signed by Plaintiff to counsel for Defendant (Ena Diaz).	0.10	32.50
7/18/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' revisions to draft of Joint Motion for Settlement Approval.	0.30	97.50
7/18/2024	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Ena Diaz) regarding revisions to draft of Joint Motion for Settlement Approval, and preparing	0.10	32.50



7/18/2024	Brooks LaRou Esq.	Draft/revise	draft of Proposed Order granting the same. Drafted Proposed Order approving Joint Motion for Settlement Approval/Dismissal.	0.30	97.50
7/18/2024	Brian H. Pollock Esq.	Draft/revise	Further revise the proposed Joint Motion to Approve to include a reference to Magistrate Judge Goodman's recent order of approval in another case and to include the request for dismissal conditioned upon a retention of jurisdiction and then enclose same in an email to Ms. Diaz explaining the revisions and reason why we need to include a request for approval; attach clean and redlined versions	0.60	300.00
7/18/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of email from Ms. Diaz enclosing her proposed revisions to the Joint Motion to Approve; review same	0.30	150.00
7/19/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Ena Diaz) requesting her approval to file Joint Motion to Approve Settlement.	0.10	32.50
7/19/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of email from Ms. Diaz approving the revisions to the Joint MTD for filing	0.10	50.00
7/22/2024	Steffany Sanguino	Paralegal	I emailed the W4 to the client and texted him to inform him.	0.10	16.50
7/22/2024	Steffany Sanguino	Paralegal	I emailed the W9 and W4 to OC. Along with our W9.	0.10	16.50
7/31/2024	Brooks LaRou Esq.	Email with Client	Receipt of email from client regarding status of settlement; respond regarding status of pending motion, what to expect, and approval and timeline for receiving settlement funds after approval	0.30	97.50
8/1/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order denying settlement approval	0.20	100.00
8/1/2024	Brian H. Pollock Esq.	Draft/revise	Begin to revise motion for approval to include factual and procedural history as well as law re: no consideration of proportionality between wages and fees and to address justification for fees sought	3.10	1,550.00

**Services Subtotal: 26,213.80**

## Expenses

Date	Vendor	Category	Description	Total
2/12/2024	FairLaw Firm	Filing Fee - Federal Court		405.00
3/1/2024	FairLaw Firm	Service of Process	Invoice for Non-service for Alpha & Omega	46.40
3/1/2024	FairLaw Firm	Service of Process	Invoice for Non-service for Liz Lago	46.40
3/22/2024	FairLaw Firm	Service of Process	Invoice for Service on Alpha and Omega	46.60
3/22/2024	FairLaw Firm	Affidavit of Service	Invoice for Service on Liz Lago	46.40

**Expenses Subtotal: 590.80**

## Notes:

**Total: 26,804.60**

Please make all amounts payable to FairLaw Firm. Tax ID No.: 20-1722656.

Payment is due upon receipt.

Although you can pay by credit card or e-check, payment by credit

